

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE**

**HECTOR L. ROSARIO RUIZ**

**DEBTOR**

**CASE NO.: 09-00764 BKT**

**CHAPTER 13**

**APPLICATION FOR COMPENSATION FOR  
ATTORNEY'S FEES PURSUANT TO RULE 2016 REQUEST**

**TO THE HONORABLE COURT:**

**COMES NOW** the undersigned attorney and very respectfully prays and states:

1) That the undersigned continuously throughout this case, since the employment by the debtor, has served as counsel for the debtor.

2) The undersigned legal counsel has not received any additional attorney's fees for services rendered, described in more detail in the attached invoice refer herein as Exhibit A, and following the statement of compensation as per Rule 2016(b) included in the Petition.

3) The undersigned legal counsel requests this Honorable Court to approve as compensation for attorney's fees (invoice attached) for legal work and advice covering the period from filing until present. The counsel has performed all her duties in defense and protection of the debtor.

4) The undersigned attorney has provided services necessary to protect the interests of the debtors in connection with the bankruptcy case and to protect the estate itself.

5) The regular hourly rate charged by the undersigned attorney for bankruptcy and non-bankruptcy legal services is \$140.00.

6) In support of her request for compensation, the undersigned attorney respectfully prays the following statements with respect to the considerations set forth in bankruptcy law.

The service rendered and expenses incurred are reasonable and necessary and actual services provided in the above captioned case. Further, the time spent on such services are clearly stated for each independent task performed and the time spent is actual and necessary, the time spent by the attorney and professional employees for which she seeks compensation herein was reasonable and appropriate, and not excessive, redundant, or otherwise unnecessary.

The rates charged by the undersigned attorney are reasonable and customary and in line with the prevailing market rate in this legal community for similar services by attorneys and professional employees of reasonably comparable skill, experience, and reputation.

Reasonableness of expenses incurred. The undersigned attorney respectfully represents that the disbursements made by her, and expenses actually incurred by her in connection with its representation of the debtor as set forth, and for which she seeks reimbursement in this application, are reasonable and necessary.

7) In the event of an objection to this fee application, or, alternatively, if the Court so desires, the undersigned attorney will present direct evidence and/or opinion evidence as to the reasonableness and necessity for the services rendered or the expenditure of the disbursement and out-of-pocket expenses for which she seeks reimbursement. Otherwise, we respectfully requests the Court to examine the statement of services rendered and of disbursements made and out-of-pocket expenses incurred by the undersigned attorney as detailed in Exhibit "A" and rely upon its own expertise to determine that the disbursements made and out-of-pocket expenses incurred by the undersigned attorney are reasonable.

8) We also request that the Trustee be ordered to pay these fees from the funds available under the above captioned matter.

**NOTICE OF OPPORTUNITY FOR HEARING**

**PLEASE TAKE NOTICE** that unless a party in interest files an objection to this application for fees and request for hearing in writing with the Clerk of the Court and with copy to the undersigned within FOURTEEN (14) DAYS from the date of this motion, this motion may be sustained by the court without further notice or hearing pursuant to Bankruptcy Rules and General Order 00-04. If the party in interest has no objection to the above motion, no action is needed to be taken.

**WHEREFORE** the undersigned attorney respectfully prays from the Court to take notice of the above and foregoing application and, after said notice and hearing, the requested compensation and reimbursements of expenses be advanced to Rafael Moreno García / Rosana Moreno Rodriguez in the amount requested for legal services rendered in the above captioned matter.

**In Carolina, Puerto Rico this August 18, 2011**

MORENO & MORENO LAW OFFICE  
/s/ROSANA MORENO RODRIGUEZ  
ATTORNEY FOR DEBTOR  
USDC #221903  
P.O. BOX 679  
TRUJILLO ALTO, PR. 00977  
PHONE: (787) 750-8160 / 8166 (CAROLINA OFFICE)  
FAX: (787) 750-8243  
PHONE: (787) 287-4116 / 4117 (GUAYNABO OFFICE)  
FAX: (787) 287-4111  
[rosana.moreno@morenoandmorenolaw.com](mailto:rosana.moreno@morenoandmorenolaw.com)

**I HEREBY CERTIFY** that on this same date copy of this motion has been forwarded by electronic filing to the Chapter 13 Trustee of the case, and to the U.S. Trustee's office, and all other creditors as per the master list address of the case and/or the CM/ECF System.

**ITEMIZED DETAILS OF PERFORMED  
WORK IN CASE NO.: 09-00764 BKT**

**HECTOR L. ROSARIO RUIZ**

- **APRIL 6, 2011** **0:50**
  - Review Motion Motion for Relief From Stay and letter to client.
- **MAY 3, 2011** **0:50**
  - Answer to 362 and meeting with client.
- **MAY 24, 2011** **0:50**
  - Review Trustee's Motion to Dismiss and letter to client.
- **MAY 31, 2011** **0:50**
  - Attendance to hearing.
- **JUNE 22, 2011** **0:50**
  - Reply to Trustee's Motion to Dismiss and meeting with client.
- **JUNE 28, 2011** **0:50**
  - Attendance to hearing.

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• JULY 27, 2011 1:00

◦ Preparation of Motion for Post Confirmation Modification of Chapter 13 Plan.

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TOTAL OF HOURS: 4:00 × \$140.00 = \$560.00

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN THE MATTER OF**

**HECTOR L. ROSARIO RUIZ**

**DEBTOR**

**CASE: 09-00764 BKT**

**CHAPTER 13**

**NOTICE TO CREDITORS AND PARTIES IN INTEREST**

**TO THE HONORABLE COURT:**

COMES NOW the debtors represented by the undersigned attorney and very respectfully prays and states as follows:

1. That **A MOTION FOR APPLICATION FOR COMPENSATION** has been filed by debtor's attorney.
2. You as a creditor or party in interest are hereby notified of such request.

If you as a party in interest have an objection to the request you have to file a written objection with the Court within the next 14 FOURTEEN DAYS. Absent such written objection the request may be granted by the Court without further proceedings. If an objection is filed the Court will schedule a hearing to evaluate the request at the time the Court deems appropriate.

I HEREBY CERTIFY that on the same date of this Notice a copy of the mentioned MOTION was filed by regular or electronic means with the Court who provide Notice to all creditors in the CM/ECFM System and by regular mail to all creditors listed in the master list address that are not in the electronic register of the Court.

In Carolina, Puerto Rico this August 18, 2011

MORENO & MORENO LAW OFFICE  
/s/ROSANA MORENO RODRIGUEZ  
ATTORNEY FOR DEBTOR  
USDC #221903  
P.O. BOX 679  
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FAX: (787) 750-8243  
PHONE: (787) 287-4116 / 4117 (Guaynabo Office)  
FAX: (787) 287-4111  
[rosana.moreno@morenoandmorenolaw.com](mailto:rosana.moreno@morenoandmorenolaw.com)

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN THE MATTER OF  
HECTOR L. ROSARIO RUIZ  
DEBTOR**

**CASE: 09-00764 BKT  
CHAPTER 13**

**CERTIFICATE OF SERVICE**

COMES NOW the debtors represented by the undersigned attorney and very respectfully prays and states as follows:

1. That **A MOTION FOR APPLICATION FOR COMPENSATION** has been filed by debtor's attorney.
2. You as a creditor or party in interest are hereby notified of such request.

I HEREBY CERTIFY that on the same date of this Certificate of Service a copy of the mentioned MOTION was filed by regular or electronic means with the Court who provide Notice to all creditors in the CM/ECFM System and by regular mail to all creditors listed in the master list address that are not in the electronic register of the Court.

In Carolina, Puerto Rico this August 18, 2011

MORENO & MORENO LAW OFFICE  
/s/ROSANA MORENO RODRIGUEZ  
ATTORNEY FOR DEBTOR  
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**09-00764-BKT13 HECTOR L ROSARIO RUIZ****Case type: bk Chapter: 13 Asset: Yes Vol: v Bankruptcy Judge: BRIAN K. TESTER**  
**Date filed: 02/04/2009 Date of last filing: 08/18/2011 Plan confirmed: 10/05/2009**

## Creditors

**AES/PHEAA** (3039006)  
PO Box 8147 (cr)  
Harrisburg PA 17105

**AXESA** (2726012)  
PO BOX 191225 (cr)  
SAN JUAN PR 00919-1225

**AXESA SERVICIOS DE INFORMACION** (2857764)  
PO BOX 191225 (cr)  
SAN JUAN PR 00919 1225

**BANCO POPULAR DE PR** (2713642)  
PO BOX 366818 (cr)  
SAN JUAN PUERTO RICO 00936-6818

**BANCO POPULAR DE PR** (2703867)  
MORTGAGE SERVICING DIVISION (cr)  
PO BOX 71375  
SAN JUAN PR 00936-7077

**BANCO POPULAR DE PR VISA** (2703868)  
CARD PRODUCTS DIVISION (cr)  
PO BOX 70100  
SAN JUAN PR 00936

**BANCO POPULAR PUERTO RICO** (2739067)  
CARDONA JIMENEZ LAW OFFICE, PSC (cr)  
PO BOX 9023593  
SAN JUAN, PR 00902-3593

**BAYVIEW LOAN SERVICING LLC** (2722381)  
4425 PONCE DE LEON BLVD (cr)  
5TH FLOOR  
CORAL GABLES FL 33146

**BEST & GENERAL SERVICES INC** (2726015)  
URB CAPARRA TERRACE (cr)  
1307 AVE AMERICO MIRANDA  
SAN JUAN PR 00921-2109

**CITI CARDS** (2703869)  
PO BOX 183052 (cr)  
COLUMBUS OH 43218-3052

<b>CLENDO REFERENCE LAB</b> PO BOX 549 BAYAMON PR 00960	(2709830) (cr)
<b>COLLECTION ADVISEMENT ASSOCIATES INC</b>  PO BOX 195162 SAN JUAN PR 00919-5162	(2709831) (cr)
<b>CRIM</b> PO BOX 195387 SAN JUAN PR 00919-5387	(2703870) (cr)
<b>CSC LOGIC BAYVIEW FINANCIAL</b> PO BOX 741297 DALLAS TX 75374	(2711753) (cr)
<b>CSC LOGIC INC</b> PO BOX 972892 DALLAS TX 75397-2892	(2703871) (cr)
<b>DEPARTAMENTO DE HACIENDA</b> PO BOX 9024140 SAN JUAN, PR 00902-4140	(2838729) (cr)
<b>DEPARTAMENTO DE HACIENDA</b> PO BOX 9024140 SAN JUAN, PR 00902-4140	(2815855) (cr)
<b>DEPARTAMENTO DE HACIENDA</b> OFICINA 424-B SECCION DE QUIEBRAS PO BOX 9024140 SAN JUAN PR 00902-4140	(2703872) (cr)
<b>DEPARTAMENTO DE HACIENDA</b> 424-B SECCION QUIEBRAS PO BOX 9024140 SAN JUAN PR 00902-4140	(2709827) (cr)
<b>DEPARTAMENTO DEL TRABAJO</b> PO BOX 191020 SAN JUAN PR 00919-1020	(2709828) (cr)
<b>Doral Bank</b> PO Box 70308 San Juan, PR 00936-8308	(2719651) (cr)
<b>DORAL FINANCIAL CORP</b> PO BOX 71529 SAN JUAN PR 00936-8629	(2703873) (cr)
<b>ECMC</b> P.O. Box 75906 Saint Paul, MN 55175	(3065313) (cr)

**FIA CARD SERVICES**  
PO BOX 15137  
WILMINGTON DE 19850-5137

(2703874)  
(cr)

**FIRST BANK**  
BANRUPTCY DIVISION  
P.O. BOX 9146  
SAN JUAN, PR 00908-0146

(2709013)  
(cr)

**FIRST BANK**  
DEPARTAMENTO DE PRESTAMOS  
PO BOX 19327  
SAN JUAN PR 00910-1427

(2703875)  
(cr)

**FIRSTBANK PUERTO RICO**  
BANKCARD SERVICES  
PO BOX 15719  
WILMINGTON DE 19886-5719

(2703876)  
(cr)

**FONDO DEL SEGURO DEL ESTADO**  
STATE INSURANCE  
PO BOX 858  
CAROLINA PR 00986-0858

(2709829)  
(cr)

**GMAC**  
PAYMENT PROCESSING CENTER  
PO BOX 78369  
PHOENIX AZ 85062-8369

(2703877)  
(cr)

**HECTOR L ROSARIO RUIZ**

(2703866)  
(cr)

**IMMUNO REFERENCE LAB**  
426 CALL AGUEYBANA URB EL VEDADO  
HATO REY PR 00918

(2709832)  
(cr)

**INTERNAL REVENUE SERVICES**  
PHILADELPHIA PA 19255

(2703878)  
(cr)

**INTERNAL REVENUE SERVICES**  
PHILADELPHIA PA 19255

(2709833)  
(cr)

**JEFFERSON CAPITAL SYSTEMS LLC**  
PO BOX 7999  
ST CLOUD MN 56302

(3021958)  
(cr)

**LAB CARIBBEAN MEDICAL TESTING CENTER**  
PO BOX 192071  
SAN JUAN 00919-2071

(2709834)  
(cr)

**Laboratorio Clinico Toledo**  
c/o Lcdo.Francisco Vicenty Groneau  
PO Box 4458

(2782376)  
(cr)

Vega Baja, PR 00694

**Laboratorio Clinico Toledo**

c/o Lcdo. Francisco Vicenty Groneau

PO Box 4458

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(2782378)

(cr)

**LCDA JULIETTE DONATO BOFILL**

ATTORNEY OF QUEST DIAGNOSTIC

GARDEN HILLS PLAZA MSC 357 1353 CARR 19

GUAYNABO PR 00966-2700

(2703879)

(cr)

**LCDO FRANCISCO VINCENTY GRONAU**

PO BOX 4458

VEGA BAJA PR 00694

(2703880)

(cr)

**LEADING EDGE RECOVERY SOLUTIONS**

PO BOX 129

LINDEN MI 48451-0129

(2703881)

(cr)

**LEADING EDGE RECOVERY SOLUTIONS**

PO BOX 129

LINDEN MI 48451-0129

(2709835)

(cr)

**LVNV FUDING LLC**

PO BOX 10497

GREENVILLE SC 29603-0584

(2703882)

(cr)

**LVNV Funding LLC**

Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

(2768159)

(cr)

**MEDICARE PART B DEBT RECOVERY**

PO BOX 45040

JACKSONVILLE FL 32232

(2769856)

(cr)

**MEDICOOP**

PO BOX 194450

SAN JUAN, PR, 00919-4450

(2774196)

(cr)

**MEDICOOP**

PO BOX 194450

SAN JUAN PR 00919-4450

(2703883)

(cr)

**MEDICOOP**

PO BOX 194450

SAN JUAN, PR, 00919-4450

(2740768)

(cr)

**MUNICIPIO AUTONOMO DE CAROLINA**

APARTADO 8

CAROLINA, PR 00986-0008

(2815852)

(cr)

**MUNICIPIO AUTONOMO DE CAROLINA**

PATENTE MUNICIPAL PO BOX 8 CAROLINA PR 00986-0008	(2726011) (cr)
<b>MUNICIPIO AUTONOMO DE CAROLINA</b> APARTADO 8 CAROLINA, PR 00986-0008	(2838728) (cr)
<b>MUNICIPIO DE AUTONOMO DE CAROLINA</b> PATENTE MUNICIPAL APARTADO 8 CAROLINA PR 00986-0008	(2703884) (cr)
<b>PALLINO RECEIVABLES III LLC</b> c o Jefferson Capital Systems LLC PO BOX 7999 SAINT CLOUD MN 56302-9617	(2759169) (cr)
<b>POPULAR AUTO</b> PO BOX 50045 SAN JUAN PR 00902	(2703886) (cr)
<b>POPULAR AUTO</b> PO BOX 366818 SAN JUAN PUERTO RICO 00936-6818	(2713711) (cr)
<b>POPULAR AUTO</b> PO BOX 15011 SAN JUAN PR 00902-8511	(2703885) (cr)
<b>POPULAR AUTO (POPULAR LEASING)</b> PO BOX 366818 SAN JUAN PUERTO RICO 00936-6818	(2713674) (cr)
<b>Portfolio Recovery Associates, LLC.</b> P.O. Box 41067 Norfolk, VA 23541	(3075809) (cr)
<b>PRA Receivables Management, LLC</b> As Agent Of Portfolio Recovery Assocs. PO Box 12914 NORFOLK VA 23541	(2744145) (cr)
<b>Puerto Rico Department of Labor</b> Collection Unit -12th Floor 505 Muoz Rivera Ave San Juan PR 00918	(2752158) (cr)
<b>PUERTO RICO TELEPHONE COMPANY</b> PO BOX 70239 SAN JUAN PR 00936-8239	(2703887) (cr)
<b>QUEST DIAGNOSTIC INC</b> 3 GIRALDA FARMS	(2703888)

MADISON NJ 07940	(cr)
<b>Roundup Funding, LLC</b>	
MS 550	(2773701)
PO Box 91121	(cr)
Seattle, WA 98111-9221	
<b>SEARS</b>	
PO BOX 105491	(2703889)
ATLANTA GA 30348-5491	(cr)
<b>SECURITY DATA</b>	
PO BOX 189	(2709836)
BAYAMON PR 00960	(cr)
<b>STUDENT ASSISTANCE FOUNDATION</b>	
OF MONTANA ASSIGNING TO	(2724252)
2500 BROADWAY	(cr)
HELENA MT 59601	
<b>STUDENT ASSISTANCE FOUNDATIONS</b>	
PO BOX 1689	(2703890)
HELENA MT 59624-1689	(cr)
<b>VILLA MARINA</b>	
YACHT & BEACH CLUB	(2703891)
PO BOX 1071	(cr)
FAJARDO PR 00738	

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PACER Service Center			
Transaction Receipt			
08/18/2011 16:10:41			
<b>PACER Login:</b>	mg0178	<b>Client Code:</b>	
<b>Description:</b>	Creditor List	<b>Search Criteria:</b>	09-00764-BKT13 Creditor Type: All
<b>Billable Pages:</b>	3	<b>Cost:</b>	0.24